

EXHIBIT A

From: [Ong, Andrew](#)
To: [Edward Chin](#)
Cc: [DG-CommScope-TQDelta](#); [Eric Findlay](#); [Sarah Hene](#); [CommScope@winston.com](#); [tqd](#); [TQD-MHM-TX@mcandrews-ip.com](#)
Subject: RE: TQ Delta, LLC v. ComScope, et al.; 2:21-cv-310-JRG - Dr. Putnam's First Supplemental Expert Report re CommScope
Date: Friday, December 9, 2022 11:20:06 AM

Hi Ed,

CommScope opposes TQ Delta's motion to leave and also intends to file a motion to strike Putnam's first supplemental report, as Mr. Putnam had all of the information cited in his supplemental report months before serving his opening report. We can meet and confer on both motions at the same time.

Also, if TQ Delta is not agreeing to produce the Nokia-TQD license communications, we should meet and confer on that as well.

I think we can be available at 4:00 pm Central today if that works for you. Thanks.

Andy

From: Edward Chin <echin@davisfirm.com>
Sent: Thursday, December 8, 2022 2:26 PM
To: Ong, Andrew <AOng@goodwinlaw.com>
Cc: DG-CommScope-TQDelta <DG-ARRIS-TQDelta@goodwinlaw.com>; Eric Findlay <EFindlay@findlaycraft.com>; Sarah Hene <shene@findlaycraft.com>; CommScope@winston.com; tqd <tqd@davisfirm.com>; TQD-MHM-TX@mcandrews-ip.com
Subject: TQ Delta, LLC v. ComScope, et al.; 2:21-cv-310-JRG - Dr. Putnam's First Supplemental Expert Report re CommScope

EXTERNAL

Andy,

TQ Delta intends to file a motion to seek leave of Court to formally serve Dr. Putnam's First Supplemental Report, dated November 16, 2022, which TQ Delta informally served on CommScope three weeks ago. Since then, each side has questioned Drs. Putnam and Becker about that report in their recent depositions. Also, CommScope has not served a rebuttal report, and it appears that CommScope sees no need to do so ("I don't see any reason that I would need to respond . . ." at p. 89 Becker rough depo). Nevertheless, if CommScope would like to serve a rebuttal report, TQ Delta consents to the service within a reasonable time of a rebuttal report that addresses the issues in the First Supplemental Report and would state its consent in the motion for leave.

Please let me know if CommScope opposes the motion.

If CommScope does not oppose the motion, TQ Delta is willing to include in the motion the same non-waiver language that the parties agreed to include in the TQ Delta's Unopposed Motion for Leave to Formally Serve Dr. Putnam's Second Supplemental Report, which the Court granted today.

(Proposed Language)

"The parties agree and acknowledge that CommScope's consent to service of the First Supplemental Report is not a concession that the opinions expressed in that report are admissible, reliable, or relevant nor is it a waiver of

CommScope's objections, if any, to the opinions expressed therein. Likewise, the parties agree and acknowledge that TQ Delta's consent to the service of a rebuttal expert report, if any, by CommScope to the First Supplemental Report is not a concession that the opinions expressed in that rebuttal report are admissible, reliable, or relevant nor is it a waiver of TQ Delta's objections, if any, to the opinions expressed therein."

If CommScope opposes the motion, please let me know CommScope's basis for opposing the motion and a proposed time on Friday for us to conduct a telephonic meet-and-confer.

I look forward to hearing back from you.

Thanks,

Ed

Ed Chin, Of Counsel

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